

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:
All Actions

**STATEMENT INSTEAD OF
REDACTED DOCUMENTS**

I certify that Defendants have filed a Notice of Motion and Motion to Remove the “Confidential” Designation from Documents Produced by Ridgeview Medical Center, together with a Memorandum of Law, and Declaration of Benjamin W. Hulse with Exhibits A-H.

The following Declaration Exhibits have been marked “Confidential” under the Protective Order, and redaction is impracticable.

1. Exhibit A, which is a summary chart of the documents at issue in 3M’s motion.

1. Exhibit B, which is a copy of a document produced to 3M in discovery that was marked as “Confidential” by the producing party.

2. Exhibit C, which is a copy of a document produced to 3M in discovery that was marked as “Confidential” by the producing party.

3. Exhibit D, which is a copy of a document produced to 3M in discovery that was marked as “Confidential” by the producing party.

4. Exhibit E, which is a copy of a document produced to 3M in discovery that was marked as “Confidential” by the producing party.

5. Exhibit F, which is an excerpt from the transcript of the Deposition of Dr. Scott Augustine, which has been designated as “Confidential.”

Dated: May 3, 2017

Respectfully submitted,

/s/ Benjamin W. Hulse

Benjamin W. Hulse (MN #0390952)

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